IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI ST. JOSEPH DIVISION

STACY ARNOLD,)	
Plaintiff,)	
v.)	Case No. 19-06137-CV-SJ-BP
CITY OF ST. JOSEPH,)	Case 1(0. 1) 00137 C V 55 B1
ST. JOSEPH PUBLIC LIBRARY,)	
OFFICER REBECCA HAILEY (IN HER)	
PERSONAL AND PROFESSIONAL CAPACITY))	
AND ROGER CLARY)	
)	
)	
Defendants)	

MOTION FOR EXTENSION OF TIME

Comes now, Plaintiff, Stacy Arnold and respectfully moves the Court to grant an extension of seven (7) days for Plaintiff to respond to Defendant Clary's motion for summary judgment (ECF 51). In support of this motion, Plaintiff states as follows:

- On March 24, 2020, Plaintiff reached out to counsel for Defendant Clary and proposed an agreement to dismiss Defendant Clary from this action and that neither party seek costs or fees from the other party.
- 2) Plaintiff was amenable to additional stipulations of the agreement set forth by Defendant and worked in good faith with counsel for Defendant to establish mutually agreed upon wording and finalize the agreement.
- 3) There are three (3) parties to the proposed agreement, which is not yet finalized (signed) by all parties. Based on Plaintiff's communication with counsel for Defendant Clary, she has no reason to believe that the agreement will not be finalized.

4) While Plaintiff remains in communication with counsel for Defendant, Plaintiff

disagrees with arguments set forth in ECF 52, particularly part (c), and wishes to preserve

the opportunity to respond to Defendant Clary's summary judgment motion in the event

that an agreement is not finalized.

5) Plaintiff's reply suggestions to Defendant Clary's motion for summary judgment are due

tomorrow, April 3, 2020.

6) In Plaintiff's view, a seven (7) day extension, until April 9, 2020, should give all parties

to the proposed agreement a reasonable amount of time to finalize it, and Plaintiff would

plan to file reply suggestions to Defendant Clary's motion for summary judgment on the

last day of the extension (if granted) should an agreement remain unfinalized.

7) Plaintiff has conferred with counsel for Defendant Clary and counsel indicated that he

would not oppose this requested extension.

WHEREFORE, Plaintiff respectfully requests an extension of seven (7) days to respond to

Defendant Clary's motion for summary judgment.

Respectfully Submitted,

STACY ARNOLD, Plaintiff

/s/Stacy Arnold

Stacy Arnold

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was filed electronically with the Clerk of the Court on April 2, 2020, to be served by operation of the Court's electronic filing system upon:

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